

February 24, 2020

**VIA OVERNIGHT MAIL**

United States Court House  
801 West Superior Avenue, Suite 400  
Cleveland, OH 44113

**FILED**

**FEB 25 2020**

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

RE: Garnishment – United States v. Karl James Rogers, Case No. 3:18CR26

Dear Assistant U.S. Attorney, Suzana K. Koch,

Please accept this letter as Massachusetts Mutual Life Insurance Company's ("MassMutual") Answer of the Garnishee completed in response to the Writ of Garnishment ("Writ") related to Mr. Karl James Rogers.


Mr. Rogers is a participant in the Wheeling Corporation Employees Retirement 401(k) Plan, a qualified retirement plan for which MassMutual provides recordkeeping services. The retirement plan is subject to the anti-alienation rules of the Employee Retirement Income Security Act of 1974 ("ERISA") and the Internal Revenue Code Section 401(a)(13). In accordance with those rules, MassMutual can only pay out qualified retirement funds if an applicable exemption applies. In the interim, MassMutual will place a hold on the account to ensure that no funds which may be subject to the Writ are released to the Defendant.

As requested by the Writ, Mr. Roger's account balance is \$29,283.43 as of February 14, 2020.

Furthermore, Massachusetts Mutual Life Insurance Company does not waive any rights or legal defense otherwise available to it.

Should you have any questions or concerns please do not hesitate to contact me directly at (413) 744-2381. I apologize for any inconvenience this may cause you or your client and thank you for your understanding.

Kind Regards,

  
Noell M. Tuesta  
/nmt

Cc: Clerk of Court

Karl James Rogers